

EXHIBIT H

From: "Nicholas A. Rendino" <nrendino@kasowitz.com>
Date: December 14, 2022 at 8:12:31 PM EST
To: "Nickerson, Morgan T." <Morgan.Nickerson@klgates.com>
Cc: "Christine A. Montenegro" <CMontenegro@kasowitz.com>, "Jason S. Takenouchi" <JTakenouchi@kasowitz.com>, "McDevitt, Jerry" <Jerry.McDevitt@klgates.com>, "Kelley, Derek W." <Derek.Kelley@klgates.com>, "Finnerty, Christopher S." <Chris.Finnerty@klgates.com>
Subject: Re: MLW v. WWE - Draft Protective Order and ESI Protocol

Morgan,

Given the outstanding issues with the proposed protective order and the ESI protocol, as well as the lack of consideration of our proposed protocols for expert and fact discovery, we would like to schedule a meet and confer to see if we can narrow the issues before seeking the court's intervention.

Would you be available for a call on Monday (12/19) after 1pm or Tuesday (12/20) between 10:30 and 3:00?

Thanks,

Nick

On Dec 13, 2022, at 4:26 PM, Nickerson, Morgan T. <Morgan.Nickerson@klgates.com> wrote:

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PASSWORD, OR OPEN AN ATTACHMENT UNLESS YOU KNOW THAT THE
MESSAGE CAME FROM A SAFE EMAIL ADDRESS.**

Nick,

Attached please find my client's further edits and comments to the draft protective order and draft ESI protocol. Kindly let me know if you have any questions or concerns with the same.

Best regards,
Morgan



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<DRAFT_ESI_Protocol WWE 12-13-2022 Edits.DOCX>

<DRAFT__Proposed__Protective__Order WWE Edits.DOCX>